

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION**

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| In re: Yoan Henriquez, Debtor. | Bankruptcy No. 20-12166-pmm Chapter 13 |
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NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that the undersigned hereby files his notice of appearance on behalf of Creditor, BMO Harris Bank N.A. and request that all notices given, or required to be given in this case, and all papers to be served, or required to be served in this case be given to and served upon the following:

James K. Haney, Esq.
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PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, the notices and papers referred to in Bankruptcy Rules 2002 and 9007, the disclosure statement referred to in Bankruptcy Rule 3017, and also includes, without limitation, notices of any orders, applications, demands complaints, hearings, motions, objections, petitions, pleadings or requests, plans, and any other documents brought before the Court in this case, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telecopier, or otherwise.

This Notice of Appearance, Request for All Notices, and Demand for Service of Papers shall not be deemed or construed to be a waiver of the rights of BMO Harris Bank N.A. to: (i) have final orders in non-core matters entered only after de novo review; (iii)

trial by jury in any proceeding so triable in these cases or any case, controversy or proceeding related to these cases; (iii) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) assert any other rights, claims, actions, set-offs, or recoupment to which BMO Harris Bank N.A. may be entitled, all of which are expressly reserved.

Dated: July 14, 2020

/s/ James K. Haney

James K. Haney, Esq. (NJ 29311991)

WONG FLEMING

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Attorneys for Creditor BMO Harris Bank N.A.

Certificate of Service

This Request for Notice was served electronically on the following individuals on July 14, 2020:

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/s/ James K. Haney

James K. Haney